

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**Chapter 11**

**EMAS CHIYODA SUBSEA LIMITED, *et al.*,**

**Case No. 17-31146 (MI)**

**Debtors.<sup>1</sup>**

**(Joint Administration Pending)**

**DEBTORS' REQUEST FOR EMERGENCY CONSIDERATION  
OF CERTAIN "FIRST DAY" MATTERS**

On the date hereof, the above captioned debtors and debtors in possession (collectively, the "Debtors") each filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. Counsel for the Debtors believe that the cases qualify as "Complex Chapter 11 Cases." The Debtors need emergency consideration of the following initial case matters:

1. **Joint Administration Motion:** Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of the Chapter 11 Cases and (II) Granting Related Relief [Docket No. 2];
2. **Consolidated List of Creditors Motion:** Debtors Emergency Motion for Entry of an Order (I) Authorizing the Filing of a Consolidated List of Top 30 Unsecured Creditors, (II) Waiving the Requirement that Each Debtor File a List of Creditors, and (III) Authorizing the Debtors to Establish Procedures for Notifying Parties of the Commencement of These Cases [Docket No. 4];
3. **Schedules Extension Motion:** Emergency Motion for an Order (I) Granting Additional Time to File Schedules and Statements of Financial Affairs, (II) Granting Additional Time to File Reports of Financial Information Required Under Bankruptcy Rule 2015.3,

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number and jurisdiction of formation are as follows: EMAS CHIYODA Subsea Limited (UK) (3187); EMAS Chiyoda Subsea Inc. (Delaware) (7884); EMAS CHIYODA Subsea Marine Base LLC (Texas) (5974); Lewek Falcon Shipping Pte. Ltd. (Singapore) (041E); EMAS CHIYODA Marine Base Holding Co., LLC (Texas) (7463); EMAS Chiyoda Subsea Services Pte. Ltd. (Singapore) (333Z); EMAS-AMC Pte. Ltd. (Singapore) (0442); EMAS Saudi Arabia Ltd. (Saudi Arabia) (0669); Lewek Constellation Pte. Ltd. (Singapore) (376E); EMAS CHIYODA ROV Pte. Ltd. (Singapore) (049M); EMAS CHIYODA Subsea Services B.V. (Netherlands) (4073); EMAS CHIYODA Subsea Services (UK) Limited (Scotland) (3187); EMAS CHIYODA Subsea Services LLC (Delaware) (1728); EMAS CHIYODA Subsea (Thailand) Co., Ltd. (Thailand) (1011); Gallatin Marine Management, LLC (Delaware) (8989). The address of the Debtors' U.S. headquarters is 825 Town & Country Ln, Suite 1500, Houston, TX 77024.

and (III) Authorizing Debtors to File Consolidating Monthly Operating Reports [Docket No. 5];

4. **Claims and Noticing Agent Application:** Debtors' Emergency Application for Order Authorizing the Employment and Retention of Epiq Bankruptcy Solutions, LLC as Claims, Noticing, Solicitation, and Administrative Agent Nunc Pro Tunc to the Petition Date [Docket No. 6];
5. **Employee Wages Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing, but Not Directing, the Debtors to Pay Prepetition Employee Obligations, (II) Authorizing, but Not Directing, the Debtors to Continue Certain Employee Benefit Programs in the Ordinary Course, and (III) Authorizing, but Not Directing, Applicable Banks to Honor Prepetition Checks for Payment of the Prepetition Employee Obligations [Docket No. 7];
6. **Taxes Motion:** Debtors' Emergency Motion for an Order Authorizing the Debtors to Pay Certain Prepetition Taxes and Related Obligations [Docket No. 8];
7. **Insurance Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Thereunder and (B) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies and (II) Directing Financial Institutions to Honor all Related Payment Requests [Docket No. 9];
8. **Utilities Motion:** Debtors' Emergency Motion for Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [Docket No. 10];
9. **Critical Vendor Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing, but Not Directing, Payment of Prepetition Claims of Certain Critical Vendors and Service Providers (II) Granting Related Relief [Docket No. 11];
10. **Cash Management Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Approving the Continued Use of the Debtors' Cash Management System and (II) Granting Related Relief [Docket No. 12];
11. **Motion to Enforce Automatic Stay:** Debtors' Emergency Motion for Order Enforcing and Restating Automatic Stay and Ipso Facto Provisions of the Bankruptcy Code [Docket No. 13];

12. **DIP Financing Motion:** Debtors' Emergency Motion for Entry of Interim and Final DIP Orders (I) Authorizing the Debtors to Obtain Secured Superpriority Postpetition Financing, (II) Scheduling A Final Hearing, and (III) Granting Related Relief [Docket No. 14].

Dated: Houston, Texas  
February 28, 2017

PORTER HEDGES LLP

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*Proposed Counsel for Debtors and Debtors in Possession*

**Certificate of Service**

I certify that on February 28, 2017, I caused a copy of the foregoing document to be served by the Electronic Case Filing System in the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins

John F. Higgins